

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

**IN RE: TAASERA LICENSING LLC, PATENT  
LITIGATION**

**THIS DOCUMENT RELATES TO ALL  
CASES**

**Civil Action No. 2:22-md-03042-JRG**

**JOINT MOTION FOR EXTENSION OF TIME TO FILE PROPOSED  
DISCOVERY ORDER**

Taasera Licensing LLC (“Taasera”), Quest Patent Research Corporation (“Quest”), Palo Alto Networks Inc. (“Palo Alto”), Check Point Software Technologies, Ltd. (“Check Point”), Trend Micro Incorporated (“Trend Micro Japan”), Trend Micro, Inc. (“Trend Micro US”), CrowdStrike, Inc. and CrowdStrike Holdings, Inc. (collectively, “CrowdStrike”), Fortinet, Inc. (“Fortinet”), and Musarubra US LLC d/b/a Trellix (“Trellix”) respectfully request an extension of time as follows:

I.

The current deadline for the Parties to file a Proposed Discovery Order is January 31, 2023.

II.

The parties have conferred and agree to a short three day extension for the deadline indicated above. The deadline for the Parties to file a Proposed Discovery Order would be extended from January 31, 2023, up to and including February 3, 2023.

<b>Current Deadline</b>	<b>New Deadline</b>	<b>Description</b>
January 31, 2023	February 3, 2023	File Proposed Discovery Order

III.

The Parties continue to actively negotiate in hopes of resolving all differences and/or narrowing any issues for the Court. With the additional time requested, the Parties may be able to resolve their remaining disagreements. This extension should not affect any other aspect of the current schedule.

Dated: January 31, 2023

Respectfully submitted,

By: /s/ Alfred R. Fabricant  
Alfred R. Fabricant  
NY Bar No. 2219392  
Email: ffabricant@fabricantllp.com  
Peter Lambrianakos  
NY Bar No. 2894392  
Email: plambrianakos@fabricantllp.com  
Vincent J. Rubino, III  
NY Bar No. 4557435  
Email: vrubino@fabricantllp.com  
Joseph M. Mercadante  
NY Bar No. 4784930  
Email: jmercadante@fabricantllp.com  
**FABRICANT LLP**  
411 Theodore Fremd Avenue,  
Suite 206 South  
Rye, New York 10580  
Telephone: (212) 257-5797  
Facsimile: (212) 257-5796

Justin Kurt Truelove  
Texas Bar No. 24013653  
Email: kurt@truelovelawfirm.com  
**TRUELOVE LAW FIRM, PLLC**  
100 West Houston Street  
Marshall, Texas 75670  
Telephone: (903) 938-8321  
Facsimile: (903) 215-8510

***ATTORNEYS FOR TAASERA  
LICENSING LLC***

/s/ Irene Yang  
Michael J. Bettinger, Lead Attorney  
California State Bar No. 122196  
mbettinger@sidley.com

Irene Yang  
California State Bar No. 245464  
irene.yang@sidley.com  
**SIDLEY AUSTIN LLP**  
555 California Street, Suite 2000  
San Francisco, CA 94104  
Telephone: (415) 772-1200  
Facsimile: (415) 772-7400

Andrew T. Langford  
Texas State Bar No. 24087886  
alangford@sidley.com  
Erik B. Fountain  
Texas State Bar No. 24097701  
efountain@sidley.com  
**SIDLEY AUSTIN LLP**  
2021 McKinney Avenue, Suite 2000  
Dallas, TX 75201  
Telephone: (214) 981-3300  
Facsimile: (214) 981-3400

J. Stephen Ravel  
Texas State Bar No. 16584975  
steve.ravel@kellyhart.com  
Kelly Ransom  
Texas State Bar No. 24109427  
kelly.ransom@kellyhart.com  
**KELLY HART & HALLMAN LLP**  
303 Colorado Street, Suite 2000  
Austin, TX 78701  
Telephone: (512) 495-6429  
Facsimile: (512) 495-6610

J. Mark Mann  
State Bar No. 12926150  
Mark@TheMannFirm.com  
G. Blake Thompson  
State Bar No. 24042033  
Blake@TheMannFirm.com  
**MANN | TINDEL | THOMPSON**  
201 E. Howard St.  
Henderson, Texas 75654  
(903) 657-8540  
(903) 657-6003 (fax)

**ATTORNEYS FOR DEFENDANTS  
CROWDSTRIKE, INC. and  
CROWDSTRIKE HOLDINGS, INC.**

/s/ Eric Findlay

Eric H. Findlay  
State Bar No. 00789886  
efindlay@findlaycraft.com  
Debby E. Gunter  
State Bar No. 24012752  
dgunter@findlaycraft.com  
**FINDLAY CRAFT, P.C.**  
102 North College Avenue, Suite 900  
Tyler, Texas 75702  
Telephone: (903) 534-1100  
Facsimile: (903)-534-1137

Clement S. Roberts  
California State Bar No. 209203  
croberts@orrick.com  
**ORRICK, HERRINGTON &  
SUTCLIFFE LLP**  
405 Howard Street  
San Francisco, CA 94105  
Telephone: (415) 773-5700  
Facsimile: (415) 773-5759

Alyssa Caridis  
California State Bar No. 260103  
acaridis@orrick.com  
Jake O'Neal  
California State Bar No. 332827  
jake.oneal@orrick.com  
**ORRICK, HERRINGTON &  
SUTCLIFFE LLP**  
777 South Figueroa Street, Suite 3200  
Los Angeles, CA 90017-5855  
Telephone: (213) 612-2372  
Facsimile: (213) 612-2499

Evan Brewer  
California State Bar No. 304411  
ebrewer@orrick.com  
**ORRICK, HERRINGTON &  
SUTCLIFFE LLP**  
401 Union St Suite 3300

Seattle, WA 98101  
Telephone: (206) 839-4300  
Facsimile: (206) 839-4301

***ATTORNEYS FOR CHECK POINT  
SOFTWARE TECHNOLOGIES LTD.***

/s/ Nathaniel St. Clair, II  
Nathaniel St. Clair, II  
Texas State Bar No. 24071564  
nstclair@jw.com  
Blake T. Dietrich  
Texas State Bar No. 24087420  
bdietrich@jw.com  
William T. Nilsson  
Texas State Bar No. 24123350  
wnilsson@jw.com  
**JACKSON WALKER LLP**  
2323 Ross Ave., Suite 600  
Dallas, TX 75201  
Telephone: (214) 953-6000

***COUNSEL FOR DEFENDANT,  
MUSARUBRA US LLC, D/B/A TRELLIX***

/s/ Michael R. Rueckheim  
Kelly C. Hunsaker  
KHunsaker@winston.com  
Michael R. Rueckheim  
Texas State Bar No. 24081129  
MRueckheim@winston.com  
Eimeric Reig-Plessis  
EReigPlessis@winston.com  
**WINSTON & STRAWN LLP**  
225 Shoreline Drive, Suite 520  
Redwood City, CA 94065  
Telephone: (650) 858-6500  
Facsimile: (650) 858-6550

Krishnan Padmanabhan  
KPadmanabhan@winston.com  
**WINSTON & STRAWN LLP**  
200 Park Avenue  
New York, NY 10166-4193  
Telephone: (212) 295-6700

Facsimile: (212) 294-4700

Melissa Richards Smith  
Texas State Bar No. 24001351  
melissa@gillamsmithlaw.com  
**GILLAM & SMITH, LLP**  
303 South Washington Avenue  
Marshall, TX 75670  
Telephone: 903-934-8450  
Facsimile: 903-934-9257

***ATTORNEYS FOR PLAINTIFF, PALO  
ALTO NETWORKS, INC.***

/s/ Alice Snedeker  
Melissa R. Smith  
State Bar No. 07921800  
Email: melissa@gillamsmithlaw.com  
**GILLAM & SMITH, LLP**  
303 S. Washington Avenue  
Marshall, Texas 75670  
Telephone: (903) 934-8450  
Facsimile: (903) 934-9257

Alice Snedeker  
**DUANE MORRIS LLP**  
1075 Peachtree St NE, Suite 1700  
Atlanta, Georgia 30309  
Telephone: (404) 253-6989

Holly Engelmann  
State Bar No. 24040865  
Email: HEngelmann@duanemorris.com  
**DUANE MORRIS LLP**  
100 Crescent Court, Suite 1200  
Dallas, Texas 75201  
Telephone: (214) 257-7200  
Fax: (214) 257-7201

***ATTORNEYS FOR FORTINET INC.***

/s/ Holly Engelmann  
Melissa R. Smith  
State Bar No. 07921800  
Email: melissa@gillamsmithlaw.com  
**GILLAM & SMITH, LLP**

303 S. Washington Avenue  
Marshall, Texas 75670  
Telephone: (903) 934-8450  
Facsimile: (903) 934-9257

Holly Engelmann  
State Bar No. 24040865  
Email: HEngelmann@duanemorris.com  
**DUANE MORRIS LLP**  
100 Crescent Court, Suite 1200  
Dallas, Texas 75201  
Telephone: (214) 257-7200  
Fax: (214) 257-7201

***ATTORNEYS FOR TREND MICRO  
INCORPORATED AND TREND MICRO,  
INC.***

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that, on January 31, 2023, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

*/s/ Alfred R. Fabricant*

Alfred R. Fabricant

**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that counsel of record have met and conferred in accordance with Local Rule CV-7(h) and are in agreement as to this Motion.

*/s/ Alfred R. Fabricant*

Alfred R. Fabricant